

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

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In re	:	Chapter 9
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CITY OF DETROIT, MICHIGAN,	:	Case No. 13-53846
	:	
Debtor.	:	Hon. Thomas J. Tucker
	:	
	x	

**CITY OF DETROIT’S REPLY TO DETROIT WAYNE JOINT BUILDING
AUTHORITY’S AMENDED OBJECTION TO AMOUNTS OF CURE AMOUNT
CLAIMS IN CONNECTION WITH PROPOSED ASSUMPTION OF AGREEMENT**

The City of Detroit (“City”), by its undersigned counsel, Miller, Canfield, Paddock and Stone, PLC, files this Reply to the Amended Objection to Amounts of Cure Amount Claims in Connection with the Proposed Assumption of Agreements (Docket No. 9117) (“Objection”) filed by the Detroit Wayne Joint Building Authority (“DWJBA”). The City disputes the claims asserted by the DWJBA in their entirety because (1) all late fees are disputed and are not appropriate in view of the City's bankruptcy proceedings, (2) other amounts, including claims for capital projects, were not properly authorized and approved by the City or the Financial Review Commission and are disputed, and (3) the City has a substantial offset to the DWJBA’s alleged claims based on City of Detroit/Public Lighting Department billings to the DWJBA. The City thus respectfully requests that the DWJBA's Objection be overruled.

March 3, 2015

Respectfully Submitted,

By: /s/ Marc N. Swanson

Jonathan S. Green (P33140)

Marc N. Swanson (P71149)

Miller, Canfield, Paddock and Stone, PLC

150 West Jefferson, Suite 2500

Detroit, Michigan 48226

Telephone: (313) 963-6420

Facsimile: (313) 496-7500

swansonm@millercanfield.com

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on March 3, 2015, he served the foregoing ***CITY OF DETROIT'S REPLY TO DETROIT WAYNE JOINT BUILDING AUTHORITY'S AMENDED OBJECTION TO AMOUNTS OF CURE AMOUNT CLAIMS IN CONNECTION WITH PROPOSED ASSUMPTION OF AGREEMENT*** upon counsel as listed below, via electronic mail and First Class United States mail:

Joel Applebaum
151 S. Old Woodward
Suite 200
Birmingham, MI 48009
Email: japplebaum@clarkhill.com

March 3, 2015

By: /s/ Marc N. Swanson
Marc N. Swanson (P71149)
Miller, Canfield, Paddock and Stone, PLC
150 West Jefferson, Suite 2500
Detroit, Michigan 48226
Telephone: (313) 963-6420
Facsimile: (313) 496-7500
swansonm@millercanfield.com